

Brian M. Heberlig
202 429 8134
bheberlig@steptoe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

May 10, 2019

Via ECF

Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, No. 18 Cr. 224 (ALC)

Dear Judge Carter:

On April 26, 2019, the government filed its Omnibus Opposition in response to Sadr's nine pretrial motions to dismiss and for other relief. Dkt. 108. The government's omnibus brief contained 38 pages responding to Sadr's Motion for Suppression of Search Warrant Evidence and for a *Franks* Hearing (Pretrial Motion No. 8). *See* Dkt. 108 at 56-93.

Based on the Opposition's lengthy response to the suppression motion and the very fact-intensive nature of suppression and *Franks* analysis, Sadr respectfully requests permission to file a reply brief of up to 20 pages in support of his suppression motion. Sadr will endeavor to be concise and not reach that limit. Sadr does not anticipate requiring more than 10 pages for any of his other motion reply briefs, and the cumulative length of Sadr's reply briefs will not exceed 90 pages.

Sadr has conferred with the government, and the government takes no position regarding this request.

Respectfully submitted,

/s/ Brian M. Heberlig

Reid H. Weingarten
STEPTOE & JOHNSON LLP
1114 Avenue of the Americas
New York, NY 10036
Tel: (212) 506-3900
Fax: (212) 506-3950
rweingarten@steptoe.com

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Brian M. Heberlig (*Pro Hac Vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036
Tel: (202) 429-3000
Fax: (202) 429-3902
bheberlig@steptoe.com

Counsel for Defendant
Ali Sadr Hashemi Nejad

cc: All Counsel of Record (via ECF)